

U.S. ENVIRONMENTAL PROTECTION AGENCY



ALASKA OPERATIONS OFFICE
Room E535, Federal Building
701 C Street, Box 19
Anchorage, Alaska 99513
Phone (907) 271-5083

July 27, 1988

RECEIVED

JUL 28 1988

William C. Noll, Vice President
Suneel Alaska Corporation
Seward Coal Terminal
P. O. Box 1789
Seward, Alaska 99664

SEWARD COAL TRANSFER FACILITY

Re: Seward Coal Handling Facility
NPDES #AK-004062-2

Dear Mr. Noll:

Enclosed is a copy of the Compliance Inspection Report for EPA's May 26, 1988, inspection of the Seward Coal Handling Facility. A copy of the report for the May 27, 1987, dive is also enclosed.

Based on my review, the facility was found to be in compliance with those provisions of the National Pollutant Discharge Elimination System (NPDES) permit evaluated at the time of the inspection.

However, the following items must be addressed. Please contact EPA's Water Compliance Section (WD-135) at 1200 Sixth Avenue, Seattle, WA 98101, with the proposed dates to meet each of the following:

- As discussed with you during the inspection, please submit your plans for (1) disposal of sludge in the ponds; and (2) developing/filling the small pond.
- As discussed with Gary Ackerson, extend the berms toward the ponds to direct runoff so it will not enter the drain at the low spot or otherwise convince us that coal pile runoff will not reach the drain.
- Survey existing onsite fuel storage containers above and below ground and comply with the SPCC plan requirements.

Please do not hesitate to contact me in Anchorage at (907) 271-5083, if you have any questions or concerns.

Sincerely,

A handwritten signature in cursive script that reads "Bruce Duncan".

Bruce Duncan
Environmental Scientist

Enclosures

cc: Julie Howe, ADEC - Anchorage

Exhibit B

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SOA 000663



NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding

Transaction Code

N 25

NPDES

AIK101040162211

yr/mo/day

12/8/81 05/26/88

Inspection Type

18C

Inspector

19R

Fac Type

20Z

Remarks

Reserved

Facility Evaluation Rating

B1

QA

Reserved

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Section B: Facility Data

Name and Location of Facility Inspected

Suneel Alaska Corporation - Seward Coal Handling
P. O. Box 1789, 903 Old Airport Rd. Seward Coal
Seward, Alaska 99664 Terminal

Entry Time

2:27

AM ☐ PM ☒

Permit Effective Date

10/26/84

Exit Time/Date

4:22 p.m. 05/26/88

Permit Expiration Date

10/25/89

Name(s) of On-Site Representative(s)

William C. Noll
Kris Erchinger
Gary Ackerson

Title(s)

Vice President
Office Manager
Asst. Foreman

Phone No(s)

(907) 224-3120

Name, Address of Responsible Official

William C. Noll
P. O. Box 1789
Seward, Alaska 99664

Title

Vice President

Phone No.

(907) 224-3120

Contacted

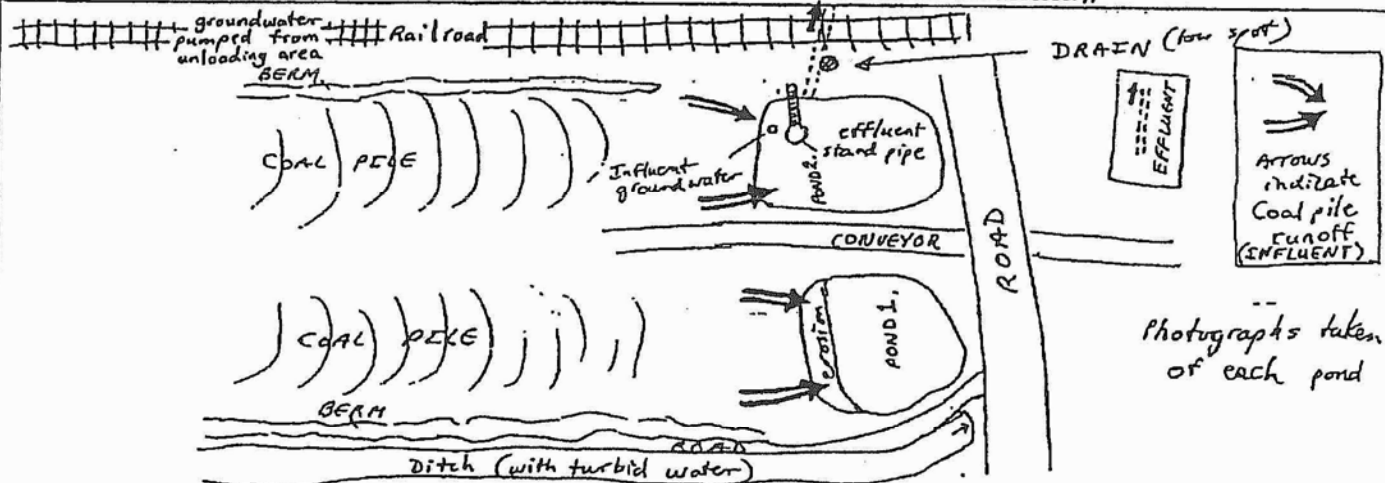
☒ Yes ☐ No

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Pretreatment	M	Operations & Maintenance
S	Records/Reports	S	Laboratory	N	Compliance Schedules	M	Sludge Disposal
S	Facility Site Review	N	Effluent/Receiving Waters	S	Self-Monitoring Program	M	Other: SPCC

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)



Name(s) and Signature(s) of Inspector(s)

P. Bruce Duncan
P. Bruce Duncan

Agency/Office/Telephone

US Environmental Protection Agency
Alaska Ops Office/Anch. (907) 271-5083

Date

05/26/88

Signature of Reviewer

Agency/Office

Date

Regulatory Office Use Only

Action Taken

Date

Compliance Status

☐ Noncompliance
☐ Compliance

NPDES COMPLIANCE INSPECTION REPORT
Suneel Alaska Corporation
Seward Coal Terminal
AK-004062-2

Inspector: P. Bruce Duncan

May 26, 1988

At the time of inspection, the facility was loading coal from the storage piles onto a vessel.

I presented my credentials and met with Bill Noll, Kris Erchinger, and Gary Ackerson.

SPCC: I asked about fuel storage onsite. Ackerson said they have 300 gallons in a 500 gallon tank. During the inspection, another above-ground tank was located near the onsite trailer. The facility does not have an SPCC plan and one may not be required. I recommend that Suneel make an inventory of all fuel storage to make sure that the above-ground maxima are not exceeded.

NPDES Permit: A copy is kept on site. They are familiar with the requirements. Their permit has a limit of 6.5 - 8.5 for pH, but the state certification requires 6.0 - 8.5 (this latter limit is now on their pre-printed DMRs). The permit expires next year. Noll was notified that a new application is needed 180 days before the expiration date.

A permit modification request was submitted to EPA on 01/28/88. Erchinger has spoken with Bill Chamberlain (EPA) and sent copies of DMRs on 02/08/88. Erchinger asked about the status of the modification request.

Records/Reports: They do not have a copy of the results from dive survey inspection under the loading conveyor.

DMR-OA - Forms were sent from EPA on 03/22/88. The samples were collected during stormy weather so Suneel requested another set so they can retake more representative samples.

Site Review: Ackerson and I looked at the settling ponds. The bank of the first pond has been eroded and Ackerson said the culvert connected it to the second pond is covered over--the connecting culvert was not visible.

A drain is located to the side of Pond 2 (see diagram in Part D in the Inspection Report Form). Part of the coal pile runoff could reach this drain and bypass the pond if berm placement is inadequate.

According to Ackerson, wet coal dust falling from the conveyor creates sludge piles. We saw examples of this under belt BC-13 prior to the tower (photo taken). Ackerson said improved scrapers help prevent this buildup and that these piles are unlikely beyond BC-13.

Flow Measurement: N/A

Laboratory: pH is measured by meter onsite; TSS samples are sent to Chem Geo.

Exhibit B

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SOA 000665

Effluent/Receiving Waters: Effluent entering the standpipe in Pond 2 appeared clear; receiving waters were not evaluated.

Pretreatment, Compliance Schedules: N/A

Self-Monitoring: Ackerson takes a composite sample by sampling once per hour over an 8 hour period. He provided me with a copy of their internal form labelled "Seward Coal Terminal: NPDES Discharge Monitoring Report Form". This should be reviewed by WPCB to ensure the sampling method described meets permit conditions; WPCB should discuss specific details of the monitoring with Ackerson.

O & M: Improvement needed for the following: (1) Pond 1 is not functional in that the severe erosion has apparently blocked the movement of runoff water out of Pond 1. (2) Berms that direct runoff from the coal piles to the settling ponds may need to be extended, especially at Pond 2, where runoff can bypass the pond and enter the drain which connects to the outfall.

Sludge Disposal: In September of 1986, Suneel stated that they planned to sample the sludge in about 2 years and decide on a disposal plan. Noll reiterated this decision. The amount of sludge and plans for its removal and disposal should be submitted to EPA within the next few months.

EPA should:

1. Provide a status letter on Suneel's modification request of 01/28/88 and follow-up Suneel's submittal of DMR copies of 02/08/88
2. Provide a copy of the dive survey report
3. Provide a second set of DMR-QA forms
4. Review Suneel's internal monitoring report form.

Suneel should:

1. Develop a plan soon for sludge disposal
2. Extend berms or otherwise insure that runoff is directed away from the drain and into the pond
3. Survey existing fuel storage containers above and below ground
4. Decide what to do with the smaller pond